

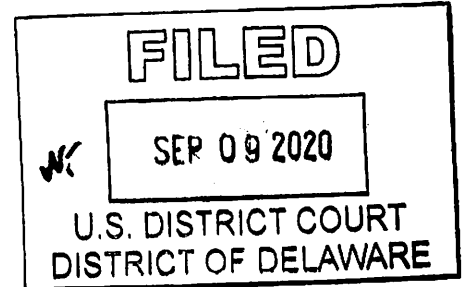
TRULINCS 08783039 - PERKINS, VICTOR - Unit: RCH-A-B

FROM: 08783039  
TO:  
SUBJECT: COMPLAINT OF A WRONGFUL DEATH  
DATE: 08/31/2020 11:30:10 AM

UNITED STATES DISTRICT COURT

DISTRICT OF DELAWARE

CASE NO. 20 - 1200



Victor B. Perkins  
Wanda Givan/  
Mary Givan/  
Dexter Givan/  
Clinton Givan/  
Yul Givan,  
PLAINTIFF(S)

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Proctor and Gamble Pharmaceutical Company/  
Astra Zeneca Manufacturing Company,  
DEFENDANT(S)

)  
(  
)

COMPLAINT OF A WRONGFUL  
DEATH DUE TO PRODUCT LIABILITY  
PURSUANT TO TITLE(S)  
18 U.S.C. 242 AND 15 U.S.C. 2051 & 2502

HONORABLE COURT,

JURISDICTION

COMES NOW, plaintiff(s) hereinafter "Givans" in pro se with COMPLAINT of the WRONGFUL DEATH of their Stepfather Wallace Anderson whom died from the use of the defendant(s) Prilosec Proton Pump Inhibiter that caused him Kidney Failure that resulted in his DEATH after being placed on dialysis in the year of 2020 pursuant to Title(s) 18 U.S.C. Sec. 242 and 15 U.S.C. Sec. 2051 and 2052, whereof, jurisdiction and adjudication is invoked upon the District of Delaware.

STATEMENT OF COMPLAINT

Givans, comes now, with contention(s) in Statement of COMPLAINT of the WRONGFUL DEATH of their Stepfather Wallace Anderson due to the use of the defendant(s) Prilosec Proton Pump Inhibiter which was used and sold as a medication for Acid Reflux in which the Givans Stepfather Wallace Anderson died from Kidney Failure thereafter being placed on dialysis, in which, the Food and Drug Administration found that the Prilosec Proton Pump Inhibiter caused Kidney Failure, Kidney Disease, Strokes, Heart Attacks and Cancer, in which, it was classified as a HARMFUL and DANGEROUS PRODUCT in 2003, 2006, 2009, 2012 and 2016 of which the defendant(s) were acknowledged of this dan-

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ger and they neglected to take this product off the market.

#### STATEMENT OF FACTS

Givans, contend in Statement of Facts in COMPLAINT of the WRONGFUL DEATH of their Stepfather Wallace Anderson whom died after using the defendant(s) Prilosec Proton Pump Inhibitor in which he suffered from Kidney Failure and was placed on dialysis, in which, he died shortly thereafter that PRODUCT LIABILITY was the cause of his DEATH and that the defendant(s) were AWARE of the facts that they sold a HARMFUL, DANGEROUS and DEADLY PRODUCT to their Stepfather Wallace Anderson.

#### RELIEF SOUGHT

Givans, seek in Relief Sought that the District of Delaware do GRANT and/or APPROVE of their COMPLAINT of the WRONGFUL DEATH of their Stepfather Wallace Anderson with a Financial Compensatory AWARD in the sum of 25 million dollars (25,000,000.00) in addition to double this amount in PUNITIVE DAMAGES as the result of psychological and psychiatric depression and emotional distress as well as the physical suffering that their Stepfather Wallace Anderson did endure during his last years on dialysis.

#### CONCLUSION

ACCORDINGLY and UNPRECEDENTED the Givans do pray that their COMPLAINT of the WRONGFUL DEATH of their Stepfather Wallace Anderson do be GRANTED and/or APPROVED as a matter of CIVIL and CONSTITUTIONAL AMENDMENTS in accordance to the DUE PROCESS of the LAW CLAUSES of the FIFTH CONSTITUTIONAL AMENDMENT RIGHTS and TITLE(S) 18 U.S.C. Sec. 242 and 15 U.S.C. Sec. 2051 and 2052 now before the District of Delaware for Deliberation and Review.

RESPECTFULLY SUBMITTED,

  
Victor B. Perkins/Plaintiff(s)

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#### AFFIDAVIT OF SERVICE

I, Victor B. Perkins, jailhouse legal assisant, do certify that a true copy of Complaint of the Wrongful Death was served upon the defendant(s) as Proctor and Gamble Pharmacuetical Company and Astra Zeneca Manufacturing Company by depositing said in the United States mail with certified postage paid beforehand at the address of 1800 Concord Pike, Talleyville, Delaware on this 4th day of September 2020, at the proper address as given:

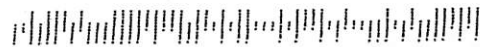
Respectfully,

  
Victor B. Perkins

Reg.No. 08783-039 1-2  
P.O. Box 4000

Victor B. Perkins

#08783-0

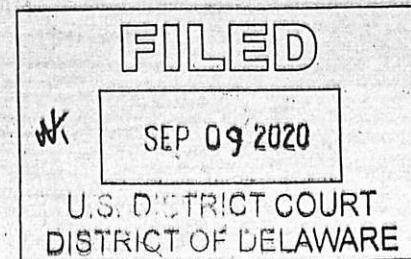


P.O. Box 4000

Federal Medical Center

Rochester, Minnesota 55903

U.S. DISTRICT COURT  
DISTRICT OF DELAWARE



ATTN: CLERK OF THE COURT  
UNITED STATES DISTRICT COURT  
DISTRICT OF DELAWARE  
844 N. KING STREET  
WILMINGTON, DELAWARE 19801